

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

---

In re:

MICHAEL A. GRAL,

Case No. 16-21329-gmh  
Chapter 11

Debtor-in-Possession.

---

In re:

CAPITAL VENTURES, LLC,

Case No. 16-21331-gmh  
Chapter 11

Debtor-in-Possession.

---

In re:

GRAL HOLDINGS KEY BISCAYNE, LLC,

Case No. 16-21330-gmh  
Chapter 11

Debtor-in-Possession.

---

**MOTION OF BIELINSKI BROS. BUILDERS, INC.  
FOR CLARIFICATION OF VIRTUAL ORDER DATED FEBRUARY 27, 2016**

---

Bielinski Bros. Builders, Inc. (the “Movant”), one of the twenty largest unsecured creditors of Michael A. Gral (the “Debtor”), respectfully moves this Court, pursuant to Section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), for an clarification of the Court’s Order dated February 27, 2016 (the “Virtual Order”).

Movant has sought to comply with the Virtual Order by:

Drafted by:  
Katherine Stadler, Sean Bosack and Nina Beck  
GODFREY & KAHN, S.C.  
One East Main Street, Suite 500  
Madison, WI 53703  
Telephone: (608) 257-3911  
Facsimile: (608) 257-0609  
E-mail: kstadler@gklaw.com; sbosack@gklaw.com; nbeck@gklaw.com

1. Re-issuing the *Notice of Motion of Bielinski Bros. Builders, Inc. for Dismissal Pursuant to Section 1112 of the Bankruptcy Code or, in the alternative, for Abstention Pursuant to Section 305 of the Bankruptcy Code or, in the alternative, for Appointment of a Chapter 11 Trustee Pursuant to Section 1104 of the Bankruptcy Code, and for Other Appropriate Relief* [see Docket No. 17, Attachment #1 in Case No 16-21329-gmh, Docket No. 10, Attachment #1 in Case No. 16-21331-gmh, and Docket No. 9, Attachment #1 in Case No. 16-21330-gmh] to include notice of an **evidentiary hearing** to be held at **3:00 p.m. on March 30, 2016** and informing notice parties that objections or responses must be received no later than **March 23, 2016**; and
2. Re-filing the *Motion of Bielinski Bros. Builders, Inc. for Dismissal Pursuant to Section 1112 of the Bankruptcy Code or, in the alternative, for Abstention Pursuant to Section 305 of the Bankruptcy Code or, in the alternative, for Appointment of a Chapter 11 Trustee Pursuant to Section 1104 of the Bankruptcy Code, and for Other Appropriate Relief* [Docket No. 17 in Case No 16-21329-gmh, Docket No. 10 in Case No. 16-21331-gmh, and Docket No. 9 in Case No. 16-21330-gmh] to indicate that the *Affidavit of Nina Beck in Support of Bielinski Bros. Builders, Inc. 's Motion for Dismissal Pursuant to Section 1112 of the Bankruptcy Code or, in the alternative, for Abstention Pursuant to Section 305 of the Bankruptcy Code or, in the alternative, for Appointment of a Chapter 11 Trustee Pursuant to Section 1004 of the Bankruptcy Code, and for Other Appropriate Relief* [Docket No. 18 in Case No 16-21329-gmh, Docket No. 11 in Case No. 16-21331-gmh, and Docket No. 10 in Case No. 16-21330-gmh] (the “Affidavit of Nina Beck”) was filed on February 26, 2016; and

3. Re-serving the Affidavit of Nina Beck in paper format, complete with full exhibits, upon each of the three Debtors, their counsel, and the Office of the United States Trustee; and
4. Re-issuing and re-filing a Certificate of Service reflecting the above-listed changes to the filing and service Movant originally made on February 26, 2016.

If the Movant has incorrectly interpreted the Virtual Order, and the Court wishes that the Affidavit of Nina Beck (which remains unchanged) also be re-filed and re-served, then the Movant seeks leave of the Court to complete filing and service of the Affidavit of Nina Beck within 24 hours of the issuance of any order or other instruction clarifying the Virtual Order to so indicate.

**WHEREFORE,** Movant respectfully requests that this Court enter an order clarifying the terms of the Virtual Order with respect to the filing and service of the Affidavit of Nina Beck.

Dated: February 29, 2016.

GODFREY & KAHN, S.C.

By: /s/ Katherine Stadler  
Katherine Stadler (State Bar No. 1030775)  
Erin A. West (State Bar No. 1075729)  
Sean O'D. Bosack (State Bar No. 1029661)  
Nina Beck (State Bar No. 1079460)

*Attorneys for Bielinski Bros. Builders, Inc.*

GODFREY & KAHN, S.C.  
One East Main Street, Suite 500  
Madison, WI 53703  
Telephone: (608) 257-3911  
Facsimile: (608) 257-0609  
E-mail: [kstadler@gklaw.com](mailto:kstadler@gklaw.com); [ewest@gklaw.com](mailto:ewest@gklaw.com); [sbosack@gklaw.com](mailto:sbosack@gklaw.com); [nbeck@gklaw.com](mailto:nbeck@gklaw.com)  
15298996.2